

CHAPTER 41. INSPECT SECTION 135.411(a)(1) OPERATOR'S MAINTENANCE RECORDS

SECTION 1. BACKGROUND

1. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. Maintenance: 3358

B. Avionics: 5358

3. OBJECTIVE. This chapter provides guidance for inspecting an operator's aircraft maintenance records under Title 14 of the Code of Federal Regulations (14 CFR) part 135, § 135.411(a)(1).

5. GENERAL. Aircraft maintenance records include any record documenting the performance of work on an aircraft. Principal inspectors must inspect an operator's aircraft maintenance records to ensure that the records meet the requirements of 14 CFR.

7. SURVEILLANCE CRITERIA. During surveillance of an operator's aircraft maintenance records, the principal inspectors must determine that all of the work was based on instructions, procedures, or information that has been approved previously or accepted by the FAA. Such data could be in the form of:

- manufacturer's manuals
- service bulletins
- service letters
- data included in the operator's approved inspection and/or maintenance programs
- approved engineering orders or authorizations
- airworthiness directives (AD)
- Other accepted documents

9. IDENTIFYING PERSONNEL.

A. Operators Operating Under Inspection Programs. Operators operating under an inspection program are not authorized to approve aircraft for return to service. Therefore, the name and the certificate numbers of the person performing the work and the person approving the work must be provided.

B. Operators Operating Under Continuous Airworthiness Maintenance Programs. In the case of an operator operating under a continuous airworthiness maintenance program, a positive means of identification, such as employee identification number, is required for any person performing or approving work.

11. RETAINING AIRWORTHINESS RELEASES.

A. Operators operating under a continuous airworthiness maintenance program need only retain the record of each airworthiness release until the work is repeated or superseded by other work or for one year after the work is performed.

B. Operators under an inspection program do not require airworthiness releases.

13. TOTAL TIME-IN-SERVICE RECORDS. Total time-in-service continues for the life of the aircraft. Engine rebuilding and certifying to zero time-in-service must not be confused with a zero time since overhaul certification. Zero time since overhaul certification does not affect the calculation of total time in service. When an engine is rebuilt to zero time, the total time-in-service is zero.

15. LIFE-LIMITED PARTS. Operators must have current status of life-limited items. This record indicates the present accumulated time-in-service of each life-limited item. The operator must be able to verify the accumulated time-in-service of all life-limited items. This is done by providing records for the item showing each segment of its operation in service since its manufacture. This may be accomplished by one of the following:

- A record audit trail providing a record of the time-in-service of the item
- A time audit trail providing a record of continuous time-in-service

17. RECORDS OF OVERHAUL. An operator must maintain overhaul records of any item required to be overhauled by the operator's inspection or maintenance program. These records must be maintained until the work is superseded or repeated by work of equivalent scope and detail.

19. INSPECTION STATUS. Inspection status defines the work that has been and is scheduled to be performed in accordance with the inspection or maintenance program. The inspection status records must show the following:

- Type of most recent inspection
- The time at which that inspection was performed
- The time since the most recent inspection expressed in terms of hours, cycles, or calendar time

- The scheduled time and type of the next inspection

21. AD'S. The operator must maintain the current status of all applicable AD's for the operator's equipment. Some acceptable sources of procedures for compliance with AD's are:

- Service bulletins
- Service letters
- Specific instructions provided in the AD
- Approved engineering orders or authorizations

23. MAJOR ALTERATIONS AND MAJOR REPAIRS. An operator is required to retain major alteration and repair records.

25. REPAIR STATION RECORDS OF WORK PERFORMED ON OPERATOR'S AIRCRAFT.

A. Repair stations performing work for operators are required by regulations to accomplish the work in accordance with the operator's program.

B. Repair stations are required to retain records of work for 2 years. Some operators have reported that maintenance records are not always available from repair stations beyond the 2 year retention period. To avoid this situation, operators should be advised to require a copy of the work documentation from the repair station at the time that the work is performed. The operator is always responsible for obtaining and retaining these records required by the Administrator.

SECTION 2. PROCEDURES

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites:

- Knowledge of the regulatory requirements of 14 CFR parts 91 and 135
- Successful completion of the Airworthiness Inspectors Indoctrination Course or equivalent
- Familiarity with the type operation being inspected

B. Coordination.

(1) This task requires coordination between the principal inspectors and may be required with AFS-620.

(2) If a geographic unit is performing this inspection, coordination with the certificate-holding district office (CHDO) must be maintained.

3. REFERENCES, FORMS, AND JOB AIDS.

A. References:

- 14 CFR parts 39, 43, 65, and 145

B. Forms. None.

C. Job Aids. None.

5. PROCEDURES.

A. *Schedule Inspection.* Inspection schedule is determined, as applicable, by:

- CHDO
- Flight Standards District Office (FSDO)
- Office with geographic responsibility

B. Review Office File.

C. *Inspect Maintenance Records.* Ensure that the operator has retained the required maintenance/alteration/inspection records for each aircraft, including airframe, engine, propeller, rotor, and appliances.

(1) For operators operating under a continuous airworthiness maintenance program, these records must include the following:

(a) A description of the work performed (data acceptable to the Administrator), including date of completion.

(b) If the person performing the work is not an employee of the operator, the following personnel data must be provided:

- Name
- Certificate number
- Kind of certificate held

(c) The signature or other positive identification of the person approving the work.

(2) For operators operating under an inspection program, these records must include the following:

(a) A description of the work performed (data acceptable to the Administrator), including date of completion.

(b) For the person performing the work, the following personnel data must be provided:

- Name
- Certificate number
- Kind of certificate held

(c) The signature and certificate number of the person approving the work.

D. Ensure that the Operator Has Maintained Records of Airworthiness Releases.

(1) For operators operating under a continuous airworthiness maintenance program, records of airworthiness releases must be maintained until the airworthiness release is repeated or superseded, or for at least 1 year.

(2) Operators operating under an inspection program are not required to have airworthiness releases, but are required to maintain their aircraft in accordance with parts 43 and 91.

E. *Inspect the Total Time-in-Service Records.* Ensure that the operator maintains records for total time-in-service for the airframe, engine, propeller, and rotors.

F. *Inspect Life-Limited Parts Records.* Ensure that the operator maintains records for life-limited parts for the following:

- Airframe
- Engine
- Propeller
- Appliances
- Rotor

G. *Inspect Overhaul Record.* Ensure that the operator has records of all parts required to be overhauled that include the time since last overhaul (hours, cycles, or calendar date).

H. Inspect Inspection Status Records. Ensure that the operator has records of the current inspection status that include the following information:

- Type, date, and time (hours, cycles, or calendar date) of inspection and next due date
- Aircraft total time-in-service

I. Inspect AD Records. Ensure that the operator has records of AD compliance that include the following information:

- The AD number, with its latest revision number and date
- The method of compliance
- The next due date and time of a recurring AD

(1) Include the surveillance of AD in all work programs where an operator performs maintenance. Accomplish AD verification by the following methods:

(a) Accomplish actual surveillance of the AD. To ensure that the AD is properly complied with, a review of all paperwork such as Environmental Assessment (EA), Engineering Order (EO), workcards, maintenance manual references and service bulletins should be included.

(b) Accomplish physical verification of previous AD.

(2) Ensure that the PTRS comment code relates to the Air Transport Association of America's aircraft codes of AD being inspected. Include in the comments the numbers of the verified AD and highlight any AD's found in noncompliance.

J. Inspect Major Alterations and Major Repairs Records. Ensure that the operator maintains a current record of all major alterations and major repairs.

K. Inspect Record System. Ensure that the operator's records are being maintained in accordance with a record-keeping system.

L. Analyze Findings. Evaluate all deficiencies to determine if corrective actions will be required.

M. Debrief Operator. Discuss the results of the inspection. Advise the operator of deficiencies discovered during the inspection and discuss how to resolve them.

7. TASK OUTCOMES.

A. *File PTRS Data Sheet.*

B. Completion of this task can result in the following:

- If inspection was performed by the office having geographic responsibility, a report of any deficiencies submitted to the CHDO
- A letter from the CHDO informing the operator of the results of the inspection
- Enforcement Investigation Report, as applicable

C. *Document Task.* File all supporting paperwork in the operator/applicant's office file.

9. FUTURE ACTIVITIES. None.